REMARKS

Claim 9 has been amended to correct a typographical error. No new matter is presented by these amendments.

Applicant respectfully requests reconsideration of the rejection of claims 1, 4-6, 8-11, 15, 18-24, 39-42, 45, and 47-48 under 35 USC Section 103(a) as being unpatentable over *Rangachari et al.* ("*Rangachari*") (US Patent 6,470,227), in view of *Tadokoro et al.* ("*Tadokoro*") (US Patent 6,463,352), further in view of *Tenney et al.* ("*Tenney*") (US Patent 6,944,584), further in view of *Haverstock* (US 6,192,415). As discussed in further detail below, the combined teachings of these references do not disclose each and every feature of Applicant's independent claim 1.

The Office cites *Rangachari* as teaching the Applicant's claimed features of receiving a first request form a remote client system, determining a function to be performed, and sending a first message to a tool in response to the first request. However, as noted by the Office, *Rangachari* does not disclose the Applicant's claimed URL path, nor the object and function fields, nor the method operation of awaiting an initiate processing acknowledge. For these elements of Applicant's claimed invention, the Office looks to the teachings of *Tadokoro, Tenney,* and *Haverstock.*

Tadokoro teaches a plurality of cutting machines, each cutting machine having a monitor input device through which monitor data indicating the status of the cutting machine is input, and a plurality of virtual machine components for collecting the monitor data. However, while *Tadokoro* teaches various embodiments for monitoring the status of cutting machines, *Tadokoro* does not teach the claimed tool object model providing a logical description which enables the control of an action and determination of physical parameters of the identified tool to determine when to initiate the action. The cited portions of *Tadokoro,* Col. 4, lines 45-65 and Col. 26, lines 45-65, relate to a virtual machine component which scans instrumentation and maintains status information, and a job order user interface. However, neither of these teachings of *Tadokoro* discloses the claimed control of an action and determination of physical parameters of the

identified tool to determine when to initiate the action. For while a user can monitor a cutting machine and place a job order, *Tadokoro* in fact teaches that jobs must be manually initiated and later confirmed as complete. *Tadokoro,* Col. 28, lines 26-45.

Moreoever, *Tadokoro* does not teach Applicant's claimed method operation of awaiting an initiate processing acknowledge from the tool, and upon receipt of said initiate processing acknowledge from the tool, awaiting an event report from the tool indicating completion of the action. For these features of Applicant's claim, the Office cites Col. 18, lines 20-25 and Col. 19, lines 50-55 of *Tadokoro*. However, these portions of *Tadokoro* merely disclose a machine monitor which sends requests to virtual machine components for status updates, and a status field as a part of a job table which may have the values of waiting, processing, or completed. Applicants submit that *Tadokoro's* teaching of receiving status updates from a virtual machine is not equivalent to the claimed method operation of awaiting an initiate processing acknowledge from the tool itself, followed by awaiting an event report from the tool indicating completion of the action.

Haverstock is directed to a system for enabling access to non-HTML objects from a web browser. Specifically, *Haverstock* teaches the use of a URL which identifies an object, and "enables non-HTML actions to be identified in the URL and the action to be performed on or relating to the object" (Col. 5, lines 19-28). However, the "objects" which are identified in *Haverstock's* URL are software objects such as documents and databases, and the action identified in *Haverstock's* URL is a software function. *Haverstock* discloses such software-related actions as opening, creating, deleting (Col. 5, line 64) and sorting (Col. 6, line 11), which only apply to software objects. In contrast, Applicant's claimed function field identifies a physical function that is to be carried out by a semiconductor processing tool. A processing tool is not subject to opening, creating, deleting, and sorting in the same manner that a software object may be so manipulated. Thus, *Haverstock* does not disclose the Applicant's claimed object field and function field. Furthermore, contrary to the Examiner's statement, *Haverstock* is not analogous art presenting concepts and practices regarding distributed software components for controlling machines remotely via a network, for *Haverstock* does not relate to the control of machines, remotely or otherwise.

Moreover, *Haverstock's* URL is a retrieval mechanism which enables users to "retrieve [software] objects and identify actions" (Col. 5, line 42) for those software objects. The objects and/or results of the actions are retrievable through a web browser, and presented to a user through a computer system. In contrast, Applicant's claimed URL identifies a physical tool in an object field and enables commands in a function field to be propagated to the tool, resulting in a real-world activity such as processing of semiconductor wafers. A physical tool cannot be "retrieved" through a web browser, nor can the physical objects which result from an identified function carried out by such a tool (e.g. processed wafers) be presented to a user through a computer system. Thus, one skilled in the art would not have been motivated to look to *Haverstock's* URL mechanism, as it does not relate to the operation of a physical tool.

Moreover, the combination of the teachings of *Haverstock* and *Tadokoro* would not achieve the aspects of Applicant's claimed invention for which these references are cited. *Haverstock* teaches retrieval of virtual objects and actions carried out on those virtual objects. Whereas, *Tadokoro* teaches a database server which "maintains a database of descriptive information describing the instrumented cutting machines and that is responsive to queries." *Tadokoro,* Col. 4, lines 47-49. As *Tadokoro's* database is merely an intermediate monitoring component that facilitates transmission of status information, the combination of *Haverstock* and *Tadokoro* would merely produce a data-retrieval mechanism that enables one to retrieve status information, and identify an action in a URL to be performed on that status information. As such, the cited teachings of *Haverstock* and *Tadokoro* in combination fail to teach a system capable of effecting a physical activity carried out by a processing tool as designated in fields of a URL, as claimed by the Applicant.

For at least the foregoing reasons, claim 1 is patentable over the prior art teachings of *Rangachari, Tadokoro, Tenney,* and *Haverstock.* Claim 15 recites a data processing system analogous to the teachings of claim 1, and is therefore patentable over the prior art for at least the same reasons as claim 1. Likewise, Claims 4-6, 8-11, 18-24, 39-42, 45, and 47-48 are patentable over the prior art for at least the reason that each of these claims depends from claim 1 or 15.

Applicant respectfully request reconsideration of the rejection of claims 12-13, 25-26, and 49-54 under 35 U.S.C. 103(a) as being unpatentable over *Rangachari,* in view of *Tadokoro,* further in view of *Tenney,* further in view of *Haverstock,* and further in view of *Nilsen et al.* ("*Nilsen*") (US 6,081,665).

With regard to these claims, the Office states that *Tenney* "strongly suggests overriding existing control programs with user-designed programs." However, the teachings of *Tenney* do not mention overriding a tool object method as claimed. Furthermore, based on this statement, the Applicant is unable to determine if the Office believes the prior art discloses the claimed feature of overriding the tool object method, or takes Official Notice regarding this issue. Therefore, the Office is kindly requested to clarify their position regarding this Applicant's claimed subject matter.

The Office notes that *Rangachari, Tadokoro, Tenney,* and *Haverstock* do not teach the claimed features of overriding the tool object method by parsing a script, determining if the script source includes a method signature matching a method signature of the tool object method, and if so, executing a corresponding portion of the script, nor the claimed feature of indicating that the default method has been overridden in an override registry list. For these features of Applicant's claimed invention, the Office looks to the *Nilsen* reference.

Nilsen teaches a real-time virtual machine method for providing efficient support for execution of portable byte-code representations of computer programs, including support for accurate defragmenting real-time garbage collection. However, Applicant is unable to find within the disclosure of *Nilsen* a teaching directed to the claimed feature of overriding a tool object method by parsing a script source.

Additionally, claims 12-13, 25-26, and 49-54 each depend from claims 1 or 15. The deficiencies of the prior art with regard to claims 1 and 15 have been discussed above. Therefore claims 12-13, 25-26, and 49-54 are patentable over the cited art for at least the foregoing reasons, and by virtue of their dependence from claims 1 or 15.

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PATENT

<u>Conclusion</u>

In view of the foregoing amendments to the claims and the above remarks, the Office is respectfully requested to withdraw the Section 103(a) rejections, and is requested to consider the newly amended claims as overcoming the teachings of *Rangachari, Tadokoro, Tenney, Haverstock,* and *Nilsen.*

A Notice of Allowance is respectfully requested. If any questions remain, the undersigned can be contacted at (408) 749-6903.

If any additional fees are missing or due, please charge to **Deposit Account No. 50-0805** (Order No. ASTGP123).

Respectfully submitted,
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